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Our File No. 450.17737/FXG

UNITED STATES DISTRICT COURT

FOR THE STATE OF DELAWARE - MISCELLANEOUS CASE NO. 05-230

HANOVER INSURANCE COMPANY,	:	UNITED STATES DISTRICT COURT FOR
	:	THE STATE OF NEW JERSEY
Plaintiff	:	
	:	CIVIL ACTION NO. 05-1591 (JWB)
vs.	:	
	:	NOTICE TO TAKE ORAL
CANAL INSURANCE COMPANY	:	DEPOSITION
	:	
Defendant.	:	
	:	

TO: Ted Flowers, Esq.
Segal, McCambridge, Singer & Mahoney, Ltd.
United Plaza
30 S. 17th Street
Suite 1700
Philadelphia, PA 19103
Attorneys for Defendant, Canal Insurance Company



BD Scanner

SIRS:

PLEASE TAKE NOTICE that in accordance with the Federal Rules of Civil Procedure, testimony will be taken by deposition upon oral examination before a person authorized by the laws of the State of Delaware to administer oaths on **March 24, 2006**, at **12:30 p.m.** at the offices of **Pratt Insurance Services, Inc., 4 Village Square, Smyrna, Delaware**, with respect to all matters relevant to the subject matter involved in this action, at which time and place the testimony of the following person will be taken:

CHERYL HURLOCK


She is to produce at said time and place the following:

1. All underwriting files, insurance applications, and all motor vehicle insurance policies issued to Christiana Motor Freight since Canal began writing insurance for said insured.

2. Any and all documents indicating the ownership, license plate numbers, VIN Numbers and other information concerning any vehicles insured under any Canal policy issued to Christiana Motor Freight between January 1, 2001 and January 1, 2004.
3. Any and all documents in any way relating to any vehicles which were specifically named on Canal policy number 395905, including information concerning the ownership of said vehicles, their VIN Numbers, license plate numbers, as well as any title documents, registrations or other documents relating to the ownership of said vehicles.
4. Any and all trip leases or other leases pursuant to which Sherman Dunn was to operate vehicles on behalf of Christiana Motor Freight, Inc.
5. Any and all documents terminating any leases pursuant to which Sherman Dunn was to operate vehicles on behalf of Christiana Motor Freight, Inc., including, but not limited to, any and all documents relating to the lease and/or termination of the lease of a 1993 Freightliner tractor bearing VIN No.: 2FUYDXYB4PA416131.
6. Any and all documents relating to the deletion of the aforesaid 1993 Freightliner tractor bearing VIN No.: 2FUYDXYB4PA416131 from the Canal policy number 395905 effective November 1, 2003.
7. Any and all correspondence between Pratt Insurance, Inc. and Canal Insurance Company concerning any policy of motor vehicle insurance issued at any time by Canal Insurance Company to Christiana Motor Freight, Inc. and concerning any vehicles to be insured under said policies.
8. Any and all documents indicating which vehicles were insured by Canal Insurance Company under its policy 395905 as of October 17, 2003.
9. Any and all documents, including title certificates, registrations, documents relating to VIN Numbers or license plate numbers of the tractor and trailer which were being used by Sherman Dunn on October 17, 2003 and which were at the premises of NCS Enterprises, Millville, New Jersey, on October 17, 2003.
10. Any and all correspondence between Canal Insurance

Company and Pratt Insurance Inc. in any way relating to Christiana Motor Freight Inc., or any policies of insurance issued by Canal Insurance Company to Christiana Motor Freight Inc.

11. Any and all documents relating to the operation of Christiana Motor Freight Inc. as an I.C.C. carrier.
12. Any and all documents referring to the I.C.C. number and/or decals of Christiana Motor Freight Inc.
13. Any and all documents relating to the decals, signage or other information on the tractor being used by Sherman Dunn on October 7, 2003, as to specifically what information was contained on Mr. Dunn's tractor, including the name and address of Christiana Motor Freight Inc., its I.C.C. number or any other information concerning same.
14. Any and all documents in any way relating to the underwriting of Christiana Motor Freight Inc. by Canal Insurance Company at any time.
15. Any and all documents regarding the addition or deletion of any vehicles on any policy of automobile, trucks or other motor vehicle insurance issued by Canal Insurance Company to Christiana Motor Freight, Inc. between January 1, 2000 and January 1, 2004.
16. Any and all documents previously submitted to the firm of Garrity, Graham, Favetta & Flinn, P.C. in connection with a deposition of Midge Clark of Pratt Insurance Services and previously scheduled for December 6, 2005.
17. Any and all agency agreements, contracts or other agreements between Pratt Insurance Services, Inc. and Canal Insurance Company in effect at any time between January 1, 2000 and present.


FRANK R. CINQUINA

Dated: March 8, 2006